

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

IN RE: ORAL PHENYLEPHRINE  
MARKETING AND SALES PRACTICES  
LITIGATION

THIS DOCUMENT APPLIES TO:

*Heaghtney v. Johnson & Johnson Consumer  
Inc., et al.,*  
No. 1:23-cv-09282-BMC (E.D.N.Y)

Case No. 1:23-md-3089-BMC

**NOTICE OF MOTION TO ADMIT  
MICHAEL KLEBANOV  
PRO HAC VICE**

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate(s) of Good Standing annexed thereto, I Michael Klebanov will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of movant, a member of the firm of Husch Blackwell LLP and a member in good standing of the bars of the States of New York, Missouri, Illinois, District of Columbia, and Maryland as attorney pro hac vice to argue or try this case in whole or in part as counsel for Defendant Dierbergs Markets, Inc. There are no pending disciplinary proceedings against me in any state or federal court.

Respectfully submitted,

Dated: January 30, 2024

By: /s/ Michael Klebanov  
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